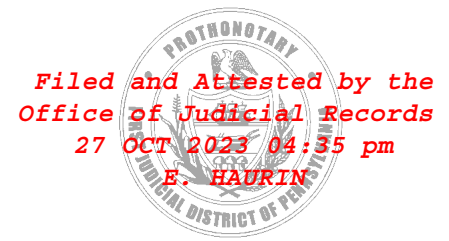


# EXHIBIT A

**ZEFF LAW FIRM, LLC**  
Gregg L. Zeff, Esquire #52648  
100 Century Parkway  
Mt. Laurel, NJ 08054  
(856) 778-9700 (t)  
(856) 702-6640 (f)  
gzeff@glzefflaw.com  
*Attorneys for Plaintiff*



**IN THE COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY**

<p>DONNA SIZER, 515 Coleman Drive Clayton, NJ 08312</p> <p><i>Plaintiff,</i></p> <p>v.</p> <p>SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY, 1234 Market Street Philadelphia, PA 19107</p> <p><i>Defendant.</i></p>	<p>CIVIL ACTION NO. 230702259</p> <p>JURY TRIAL DEMANDED</p>
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**CIVIL COMPLAINT**

**PARTIES**

1. The allegations contained in the foregoing paragraphs of this Complaint are incorporated by reference herein as if the same were set forth at length.
2. Plaintiff Donna Sizer is an adult woman residing at the above captioned address.
3. Defendant Southeastern Pennsylvania Transportation Authority ("SEPTA") is a corporate entity with a location at the above-captioned address.
4. At all times relevant hereto, Defendant acted by and through its agents, servants, and employees, each of whom acted within the scope of their job responsibilities.

**JURISDICTION AND VENUE**

5. Jurisdiction is properly laid in this Court as Defendant is subject to personal jurisdiction in the state of Pennsylvania.
6. Moreover, Plaintiff's cause of action arises out of Defendant's acts and/or omissions, which occurred in Philadelphia County, Pennsylvania.

**EXHAUSTION OF ADMINISTRATIVE REMEDIES**

7. The foregoing paragraphs are incorporated by reference herein as if the same were set forth at length.
8. Plaintiff exhausted her administrative remedies under Title VII of the Civil Rights Act of 1964, the Pennsylvania Human Relations Act, and the Philadelphia Fair Practices Ordinance. Butterbaugh v. Chertoff, 479 F. Supp. 2d 485 (W.D. Pa. 2007).
9. Plaintiff filed a timely written Charge of Discrimination against Defendant with the Equal Employment Opportunity Commission ("EEOC") alleging discrimination and retaliation.
10. The Charge was also simultaneously filed with the Pennsylvania Human Relations Commission ("PHRC") and the Philadelphia Commission on Human Relations ("PCHR").
11. Plaintiff received a Notice of Right to Sue relative to the Charge.
12. Plaintiff filed a Writ within ninety days of her receipt of the Notice of Right to Sue letter relative the Charge.
13. Plaintiff now files the instant Complaint.

**FACTUAL SUMMARY**

14. The allegations contained in the foregoing paragraphs of this Complaint are incorporated by reference herein as if the same were set forth at length.
15. Plaintiff began working for Defendant in or around 1993.
16. Plaintiff has been a Station Manager for Defendant for over twenty years.
17. During her employment with Defendant, Plaintiff worked with Joe Hamilton.
18. Throughout her employment interactions with him, Hamilton acted in a harassing manner towards Plaintiff because of her sex.
19. For example, Hamilton would engage in rude and yelling behavior towards Plaintiff, but not other male co-workers.
20. Hamilton also referred to Plaintiff as an “airhead” because of her sex.
21. If Plaintiff and Hamilton’s supervisor gave Hamilton instructions through Plaintiff, Hamilton would refuse to acknowledge such instructions because they came from Plaintiff.
22. Plaintiffs supervisors regularly witnessed this harassing behavior and failed to correct Hamilton or intervene.
23. Plaintiff made complaints to Defendant as well but the harassment continued.
24. In or around 2019, Hamilton was promoted to the position of Assistant Director.
25. Plaintiff regularly and lawfully took time off under the federal Family & Medical Leave Act (“FMLA”) to care for her sick and disabled husband.
26. As a result of Plaintiff going on intermittent FMLA leave, Hamilton denied Plaintiff preferential shifts and overtime opportunities contrary to custom and practice at Defendant.

27. When Plaintiff questioned Hamilton on why she was not receiving these benefits of employment, Hamilton told Plaintiff to the effect: “Maybe if you came to work, you would have overtime.”
28. Further, Hamilton often scheduled male co-workers to have overtime opportunities but did not give Plaintiff this benefit.
29. In another time that Plaintiff questioned Hamilton about why she was not getting overtime opportunities or having overtime retracted after taking FMLA leave, Hamilton told Plaintiff not to be a “Pam,” referring to another female co-worker who allegedly complains too much from Hamilton’s perspective.
30. In or around April 2021, in reaction to Plaintiff asking Hamilton’s supervisor about her overtime issues, Hamilton sent Plaintiff a text message criticizing her use of FMLA leave and suggesting she should instead be working from home.
31. On April 25, 2021, Hamilton sent Plaintiff a text message stating “Look who decided to come to work.”
32. Plaintiff also made a complaint to Defendant about Brian Marrow for continuously treating Plaintiff differently because she is a woman and for assigning Plaintiff more work than her male counterparts.
33. Throughout her employment with Defendant, Plaintiff made repeated complaints of harassment, discrimination, and/or retaliation.
34. But-for the on-going harassment Plaintiff was enduring and/or for engaging in protected activity, Defendant suspended Plaintiff at least one day.
35. Since on or around January 2023, Plaintiff has been out on disability leave.

36. Defendant did not effectively investigate the complaints of discrimination or retaliation that Plaintiff made.
37. Defendant's stated reasons for its adverse employment actions against Plaintiff are pretext for discrimination and/or retaliation.
38. Defendant took adverse employment action against Plaintiff because of her protected characteristics and/or in retaliation for engaging in protected activity.
39. As a result of Defendant's actions and/or inactions, Plaintiff has suffered great emotional distress.

**COUNT I**  
**AMERICANS WITH DISABILITIES ACT, AS AMENDED**  
**HOSTILE WORK ENVIRONMENT: DISABILITY**

40. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
41. By and through its course of conduct as alleged herein, Defendant discriminated against Plaintiff by allowing her to be subjected to a hostile work environment based on her disabilities or its perception of Plaintiff as having disabilities.
42. Defendant's actions violate the Americans with Disabilities Acts.
43. Defendant's conduct was intentional, deliberate, willful, and conducted in callous disregard of the protected rights of Plaintiff.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT II**  
**PENNSYLVANIA HUMAN RELATIONS ACT**  
**HOSTILE WORK ENVIRONMENT: DISABILITY**

1. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
2. By and through its course of conduct as alleged herein, Defendant discriminated against Plaintiff by allowing her to be subjected to a hostile work environment based on her disabilities or its perception of Plaintiff as having disabilities.
3. Defendant's actions violate the Pennsylvania Human Relations Act.
4. Defendant's conduct was intentional, deliberate, willful, and conducted in callous disregard of the protected rights of Plaintiff.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT III**  
**PHILADELPHIA FAIR PRACTICES ORDINANCE**  
**HOSTILE WORK ENVIRONMENT: DISABILITY**

1. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
2. By and through its course of conduct as alleged herein, Defendant discriminated against Plaintiff by allowing her to be subjected to a hostile work environment based on her disabilities or its perception of Plaintiff as having disabilities.
3. Defendant's actions violate the Philadelphia Fair Practices Ordinance.
4. Defendant's conduct was intentional, deliberate, willful, and conducted in callous disregard of the protected rights of Plaintiff.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT IV**  
**TITLE VII OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED**  
**HOSTILE WORK ENVIRONMENT: SEX**

44. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
45. By and through its course of conduct as alleged herein, Defendant discriminated against Plaintiff by allowing her to be subjected to a hostile work environment based on her sex.
46. Defendant's actions violate Title VII of the Civil Rights Act of 1964.
47. Defendant's conduct was intentional, deliberate, willful, and conducted in callous disregard of the protected rights of Plaintiff.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT V**  
**PENNSYLVANIA HUMAN RELATIONS ACT**  
**HOSTILE WORK ENVIRONMENT: SEX**

5. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
6. By and through its course of conduct as alleged herein, Defendant discriminated against Plaintiff by allowing her to be subjected to a hostile work environment based on her sex.
7. Defendant's actions violate the Pennsylvania Human Relations Act.
8. Defendant's conduct was intentional, deliberate, willful, and conducted in callous disregard of the protected rights of Plaintiff.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.



**COUNT VI**  
**PHILADELPHIA FAIR PRACTICES ORDINANCE**  
**HOSTILE WORK ENVIRONMENT: SEX**

5. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
6. By and through its course of conduct as alleged herein, Defendant discriminated against Plaintiff by allowing her to be subjected to a hostile work environment based on her sex.
7. Defendant's actions violate the Philadelphia Fair Practices Ordinance.
8. Defendant's conduct was intentional, deliberate, willful, and conducted in callous disregard of the protected rights of Plaintiff.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT VII**  
**AMERICANS WITH DISABILITIES ACT, AS AMENDED**  
**DISABILITY DISCRIMINATION**

9. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
10. Plaintiff is a member of protected classes in that she is a person with a disability and/or was perceived by Defendant to be a person with a disability.
11. Plaintiff was qualified to perform the job for which she was hired.
12. Plaintiff suffered adverse job actions, including, but not limited to, loss of pay and discipline.
13. Circumstances exist related to the above cited adverse employment actions that give rise to an inference of discrimination.

14. Defendant discriminated against Plaintiff on the basis of disability and/or perceived disability.
15. No legitimate, non-discriminatory reasons exist for the above cited adverse employment actions that Plaintiff suffered.
16. The reasons referred by Defendant for the above cited adverse employment actions that Plaintiff suffered are pretext for discrimination.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT VIII**  
**PENNSYLVANIA HUMAN RELATIONS ACT**  
**DISABILITY DISCRIMINATION**

17. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
18. Plaintiff is a member of protected classes in that she is a person with a disability and/or was perceived by Defendant to be a person with a disability.
19. Plaintiff was qualified to perform the job for which she was hired.
20. Plaintiff suffered adverse job actions, including, but not limited to, loss of pay and discipline.
21. Circumstances exist related to the above cited adverse employment actions that give rise to an inference of discrimination.
22. Defendant discriminated against Plaintiff on the basis of disability and/or perceived disability.
23. No legitimate, non-discriminatory reasons exist for the above cited adverse employment actions that Plaintiff suffered.

24. The reasons cited by Defendant for the above cited adverse employment actions that Plaintiff suffered are pretext for discrimination.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT IX**  
**PHILADELPHIA FAIR PRACTICES ORDINANCE**  
**DISABILITY DISCRIMINATION**

25. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.

26. Plaintiff is a member of protected classes in that she is a person with a disability and/or was perceived by Defendant to be a person with a disability.

27. Plaintiff was qualified to perform the job for which she was hired.

28. Plaintiff suffered adverse job actions, including, but not limited to, loss of pay and discipline.

29. Circumstances exist related to the above cited adverse employment actions that give rise to an inference of discrimination.

30. Defendant discriminated against Plaintiff on the basis of disability and/or perceived disability.

31. No legitimate, non-discriminatory reasons exist for the above cited adverse employment actions that Plaintiff suffered.

32. The reasons cited by Defendant for the above cited adverse employment actions that Plaintiff suffered are pretext for discrimination.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT X**  
**TITLE VII OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED**  
**SEX DISCRIMINATION**

33. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
34. Plaintiff is a member of protected classes in that she is a woman.
35. Plaintiff was qualified to perform the job for which she was hired.
36. Plaintiff suffered adverse job actions, including, but not limited to, loss of pay and discipline.
37. Circumstances exist related to the above cited adverse employment actions that give rise to an inference of discrimination.
38. Defendant discriminated against Plaintiff on the basis of sex.
39. No legitimate, non-discriminatory reasons exist for the above cited adverse employment actions that Plaintiff suffered.
40. The reasons referred by Defendant for the above cited adverse employment actions that Plaintiff suffered are pretext for discrimination.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT XI**  
**PENNSYLVANIA HUMAN RELATIONS ACT**  
**SEX DISCRIMINATION**

41. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
42. Plaintiff is a member of protected classes in that she is a woman.

- 43. Plaintiff was qualified to perform the job for which she was hired.
- 44. Plaintiff suffered adverse job actions, including, but not limited to, loss of pay and discipline.
- 45. Circumstances exist related to the above cited adverse employment actions that give rise to an inference of discrimination.
- 46. Defendant discriminated against Plaintiff on the basis of sex.
- 47. No legitimate, non-discriminatory reasons exist for the above cited adverse employment actions that Plaintiff suffered.
- 48. The reasons cited by Defendant for the above cited adverse employment actions that Plaintiff suffered are pretext for discrimination.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT XII**  
**PHILADELPHIA FAIR PRACTICES ORDINANCE**  
**SEX DISCRIMINATION**

- 49. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
- 50. Plaintiff is a member of protected classes in that she is a woman.
- 51. Plaintiff was qualified to perform the job for which she was hired.
- 52. Plaintiff suffered adverse job actions, including, but not limited to, loss of pay and discipline.
- 53. Circumstances exist related to the above cited adverse employment actions that give rise to an inference of discrimination.
- 54. Defendant discriminated against Plaintiff on the basis of sex.

55. No legitimate, non-discriminatory reasons exist for the above cited adverse employment actions that Plaintiff suffered.

56. The reasons cited by Defendant for the above cited adverse employment actions that Plaintiff suffered are pretext for discrimination.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT XIII**  
**AMERICANS WITH DISABILITIES ACT, AS AMENDED**  
**RETALIATION**

57. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.

58. Plaintiff engaged in activity protected by the Americans with Disabilities Act, as described in further detail herein.

59. Such protected activity included, but was not limited to, making internal complaints of discrimination, disparate treatment, and/or retaliation.

60. Plaintiff suffered adverse job actions, including, but not limited to, loss of pay and discipline.

61. There exists a causal connection between Plaintiff's participation in the protected activity and Defendant's adverse employment actions.

62. The reasons cited by Defendant for the above cited adverse employment actions that Plaintiff suffered are pretext for retaliation.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT XIV**  
**TITLE VII OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED**  
**RETALIATION**

1. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
2. Plaintiff engaged in activity protected by Title VII of the Civil Rights Act of 1964, as described in further detail herein.
3. Such protected activity included, but was not limited to, making internal complaints of discrimination, disparate treatment, and/or retaliation.
4. Plaintiff suffered adverse job actions, including, but not limited to, loss of pay and discipline.
5. There exists a causal connection between Plaintiff's participation in the protected activity and Defendant's adverse employment actions.
6. The reasons cited by Defendant for the above cited adverse employment actions that Plaintiff suffered are pretext for retaliation.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT XV**  
**PENNSYLVANIA HUMAN RELATIONS ACT**  
**RETALIATION**

7. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
8. Plaintiff engaged in activity protected by the Pennsylvania Human Relations Act, as described in further detail herein.

9. Such protected activity included, but was not limited to, making internal complaints of discrimination, disparate treatment, and/or retaliation.
10. Plaintiff suffered adverse job actions, including, but not limited to, loss of pay and discipline.
11. There exists a causal connection between Plaintiff's participation in the protected activity and Defendant's adverse employment actions.
12. The reasons cited by Defendant for the above cited adverse employment actions that Plaintiff suffered are pretext for retaliation.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT XVI**  
**PHILADELPHIA FAIR PRACTICES ORDINANCE**  
**RETALIATION**

13. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.
14. Plaintiff engaged in activity protected by the Philadelphia Fair Practices Ordinance, as described in further detail herein.
15. Such protected activity included, but was not limited to, making internal complaints of discrimination, disparate treatment, and/or retaliation.
16. Plaintiff suffered adverse job actions, including, but not limited to, loss of pay and discipline.
17. There exists a causal connection between Plaintiff's participation in the protected activity and Defendant's adverse employment actions.



18. The reasons cited by Defendant for the above cited adverse employment actions that Plaintiff suffered are pretext for retaliation.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**COUNT XVII**  
**FAMILY AND MEDICAL LEAVE ACT**  
**RETALIATION, INTERFERENCE WITH FMLA RIGHTS**

19. Plaintiff incorporates by reference each allegation contained in the preceding paragraphs as if the same were set forth more fully at length herein.

20. Plaintiff properly requested leave under FMLA.

21. As described herein, Defendant interfered with Plaintiff's proper leave of absence such that a reasonable person exercising their FMLA rights would be dissuaded from future use.

22. Defendant's actions violate FMLA.

23. Defendant's conduct was intentional, deliberate, willful, and conducted in callous disregard of the protected rights of Plaintiff.

WHEREFORE, Plaintiff seeks damages as set forth in the Prayer for Relief Section of this Complaint, *see infra*.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff requests that the Court grant her the following relief against Defendant:

(a) Damages for past and future monetary losses as a result of Defendant's unlawful discrimination;

(b) Compensatory damages;

- (c) Punitive damages;
- (d) Liquidated damages;
- (e) Emotional pain and suffering;
- (f) Reasonable attorneys' fees;
- (g) Recoverable costs;
- (h) Pre- and post-judgment interest;
- (i) An allowance to compensate for negative tax consequences;
- (j) A permanent injunction enjoining Defendant, its directors, officers, employees, agents, successors, heirs and assigns, and all persons in active concert or participation with them, from engaging in, ratifying, or refusing to correct, employment practices which violate various rights as described herein;
- (k) Order Defendant to remove and expunge, or to cause to be removed and expunged, all negative, discriminatory, and/or defamatory memoranda and documentation from Plaintiff's record of employment, including, but not limited, the pre-textual reasons cited for their adverse actions, disciplines, and termination; and
- (l) Awarding extraordinary, equitable and/or injunctive relief as permitted by law, equity and the federal statutory provisions sued hereunder, pursuant to Rules 64 and 65 of the Federal Rules of Civil Procedure.

**ZEFF LAW FIRM, LLC**

/s/ Gregg L. Zeff  
Gregg L. Zeff, Esq.  
*Attorneys for Plaintiff*

Dated: October 27, 2023

**JURY TRIAL DEMAND**

Demand is hereby made for a trial by jury as to all issues.

**CERTIFICATION**

I hereby certify that to the best of my knowledge and belief the above matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding, nor at the present time any other action or arbitration proceeding contemplated.

**ZEFF LAW FIRM, LLC**

/s/ Gregg L. Zeff  
Gregg L. Zeff, Esq.  
*Attorneys for Plaintiff*

Dated: October 27, 2023

VERIFICATON

I, Donna Sizer, verify that the statements made in this Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

Donna Sizer

Donna Sizer (Oct 26, 2023 10:36 EDT)

Donna Sizer

Dated: Oct 26, 2023

**FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
COURT OF COMMON PLEAS OF PHILADELPHIA**

DONNA SIZER  
515 Coleman Drive  
Clayton, NJ 08312

v.

SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY  
1234 Market Street  
Philadelphia, PA 19107

**NOTICE TO DEFEND**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

*You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.*

**Philadelphia Bar Association  
Lawyer Referral  
and Information Service  
One Reading Center  
Philadelphia, Pennsylvania 19107  
(215) 238-6333  
TTY (215) 451-6197**

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascantar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

*Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.*

**Asociacion De Licenciados  
De Filadelfia  
Servicio De Referencia E  
Informacion Legal  
One Reading Center  
Filadelfia, Pennsylvania 19107  
(215) 238-6333  
TTY (215) 451-6197**